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Attorney for Plaintiff, Champagne Edition, Inc.

## UNITED STATES DISTRICT COURT

# FOR THE NORTHERN DISTRICT OF CALIFORNIA

CHAMPAGNE EDITION, INC., a Foreign Canadian Corporation

Plaintiff,

V\$.

COMFORTSTALL STABLE SUPPLY COMPANY, INC., a California Corporation,

and DOES 1 to 50, inclusive

Defendants.

AND RELATED CROSS ACTION

CASE NO.: CV07-6061 MHP

PLAINTIFF CHAMPAGNE EDITION, INC'S INITIAL DISCLOSURES

Plaintiff, Champagne Edition, Inc. ("Champagne") hereby submits its initial

disclosures of witnesses and documents as required by Rule 26(a) (1) of the Federal Rules of Civil Procedure.

#### Α. **POTENTIAL WITNESSES:**

Champagne has not yet made a determination as to which individuals may be called as witnesses to support its claims and defenses. Subject to its right to call additional witnesses, and not call all of the witnesses listed below, Champagne nevertheless discloses the names, addresses and telephone numbers of each individual likely to have discoverable information that Champagne may use to support its claims and/or defenses, excluding those for impeachment purposes are as follows:

1. All individuals identified by any other parties are hereby including as those set forth in full.

Alan Champagne President of Champagne Edition, Inc. Box 29, Site 13 RR 1 Legal, Alberta T0G 1L0

Liz Stephens AR Manager of Champagne Edition, Inc. Box 29, Site 13 RR 1 Legal, Alberta T0G 1L0

Investigation and discovery is ongoing and Champagne reserves the right to supplement its witness list as information becomes known or available to Champagne.

#### B. **DOCUMENT PRODUCTION:**

Documents, date compilation and tangible things in the possession, custody

and/or control of Champagne that Champagne may use to supports its claims and/or defenses, excluding those for impeachment purposes are as follows:

- 1. All documents produced by any other parties are hereby included by those set forth in full;
- 2. Champagne Statement of Account
- 3. Champagne Invoice No. 8225
- 4. Champagne Invoice No.8370
- 5. Champagne Invoice No. 8513
- 6. Champagne Invoice No. 8671
- 7. Champagne Invoice No. 8817
- 8. Champagne Invoice No. 8918
- 9. Champagne Invoice No. 9021
- 10. Champagne Invoice No. 6216
- 11. Champagne Invoice No. 8862
- 12. Champagne Invoice No. 8995
- 13. Champagne Invoice No. 8612
- 14. Champagne Invoice No. 8613
- 15. Champagne Invoice No. 8640
- 16. Champagne Invoice No. 8676
- 17. Champagne Invoice No. 8724
- 18. Champagne Invoice No. 8725
- 19. Champagne Invoice No. 8751

- 20. Champagne Invoice No. 8752
- 21. Champagne Invoice No. 8753
- 22. Champagne Invoice No. 8777
- 23. Champagne Invoice No. 8778
- 24. Champagne Invoice No. 8781
- 25. Champagne Invoice No. 8789
- 26. Champagne Invoice No. 8813
- 27. Champagne Invoice No. 8886
- 28. Champagne Invoice No. 8891
- 29. Champagne Invoice No. 8892
- 30. Champagne Invoice No. 8893
- 31. Champagne Invoice No. 8934
- 32. Champagne Invoice No. 8944
- 33. Champagne Invoice No. 8945
- 34. Champagne Invoice No. 8946
- 35. Champagne Invoice No. 8998
- 36. Champagne Invoice No. 8999
- 37. Champagne Invoice No. 9000
- 38. Proof of Delivery Receipts

# C. **COMPUTATION OF DAMAGES**:

Plaintiffs damages are in the amount of \$99,205.63.

Dated: February 21, 2008 GALEN & DAVIS, LLP

By: <u>Isl Jeffrey M. Galen</u>
Jeffrey M. Galen, Esq.
Attorney for Plaintiff
Champagne Edition, Inc.

### CERTIFICATE OF SERVICE

STATE OF CALIFORNIA	)
COUNTY OF LOS ANGELES	)

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action, my business address is 16255 Ventura Boulevard, Suite 900, Encino, California 91436.

This Document was filed electronically. Notice of this filing will be sent to the following party by operation of the Court's electronic filing system and by U.S. Mail. Parties may access this filing through the Court's system.

On February 25, 2008, I served the foregoing document described as PLAINTIFF CHAMPAGNE EDITION, INC'S INITIAL DISCLOSURES by depositing a true copy thereof enclosed in a sealed envelope as follows:

# Ross B. Jones, Esq, Merrill, Arnone & Jones, LLP 3554 Round Barn Boulevard, Suite 303 Santa Rosa, CA 95403

- () (VIA FACSIMILE) by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below, or as stated on the attached service list, on this date before 5:00 p.m.
- (X) (VIA MAIL) I caused such envelope(s) with postage thereon fully prepaid to be placed in the United States mail at Encino, California.
- (BY OVERNIGHT DELIVERY) I caused such envelope(s) to be delivered to an overnight () delivery carrier with delivery fees provided for, addressed to the person(s) on whom it is to be served.
- (HAND DELIVERED) I caused such envelope(s) to be hand delivered, addressed to the () person(s) on who it is to be served.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed February 25, 2008. at Encipo, California.

Sheri Young	Saway
Print Name	Signature / /